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Via ECF

April 14, 2016

The Honorable Alison J. Nathan
United States District Court
Southern District of New York
40 Foley Square
New York, NY 10007

Re: The Penn Mutual Life Insurance Company v. Kathy Kehoe et al.,
Consolidated Case No. 15-CV-01111

Dear Judge Nathan:

We represent defendant Universitas Education, LLC ("Universitas") in the above-referenced consolidated matters, and write with the consent of Co-Defendants' counsel, to follow up with regard to our letter to the Court of yesterday. We have just been informed that the nonparty witness, Guy Neumann, who Universitas would like to depose, has another engagement on the morning of April 20 (the date we informed the Court yesterday that we requested to take his deposition), but is fully available for his deposition on Tuesday, April 26 (or Thursday, April 28). While we understand that taking Mr. Neumann's deposition on April 26 will be after the pre-trial court conference that is currently scheduled for April 22, we respectfully ask that the Court permit us this modification so we can accommodate the nonparty witness' schedule.

As such, we ask that the Court memo endorse this letter permitting us to take the deposition of nonparty witness Guy Neumann on April 26, 2016 (or April 28, 2016), and to extend the date for completion of expert discovery to May 27, 2016, per our prior letter of April 13, 2016 to the Court.



The Honorable Alison J. Nathan
April 14, 2016
Page 2

Thank you for your consideration of this request.

Very truly yours,

A handwritten signature in blue ink, appearing to be 'P. Colbath'.

Paula K. Colbath
Partner

SO ORDERED:

HON. ALISON J. NATHAN U.S.D.J.

Dated: _____